



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

156698
F-I - Mason
Spaul
return

REPLY TO ATTENTION OF:

MAY 25 1984

Mr. Sam McWilliams
Plant Manager
Edwin Cooper, Inc.
Sauget, Illinois 62201

Re: In the Matter of Edwin Cooper, Inc.
Docket No. V-W-84-007

Dear Mr. McWilliams:

In accordance with Paragraph 12E of the Administrative Order issued on May 17, 1984, to Edwin Cooper, Inc., you have provided notice that Edwin Cooper, Inc. has elected to complete proposed construction at its Sauget, Illinois, facility in accordance with a document entitled "Description of Remaining Construction Work in the Unit 268 Construction Site (Project N-071) Edwin Cooper, Inc., Sauget Plant." You have also provided the following submittals in accordance with said order:

- A) Written Comments.
- B) Health and Safety Plan for the Completion of the Unit 268 Construction Site, Edwin Cooper, Inc., Sauget Plant, dated May 21, 1984.
- C) Description of Remaining Construction Work in the Unit 268 Construction Site (Project N-071) Edwin Cooper, Inc., Sauget Plant, dated May 21, 1984.
- D) Project Schedule For Unit 268 Construction.

Pursuant to Paragraph 12E(iv) of the Order, the Health and Safety Plan referred to above is hereby approved subject to the following conditions:

- 1) the personal protective clothing referred to in Paragraph VI of said Health and Safety Plan include disposable boot coverings and disposable gloves which shall be worn by personnel entering the construction area and be handled in the manner set forth in said plan for handling contaminated coveralls.

- 2) Washdown water from the Equipment Decontamination Procedures referred to in Paragraph VIII of said Health and Safety Plan shall be passed through an adequate treatment device approved by EPA prior to being flushed to sewer. Any filter media or other contaminated material generated by this process shall be handled in the same manner as disposable protective clothing, pursuant to Paragraph VI of the Health and Safety Plan. Edwin Cooper shall obtain written approval from EPA prior to discharging any of this water from the tank.

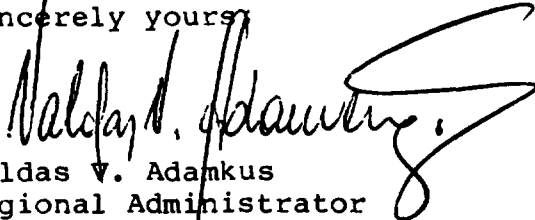
Pursuant to Paragraph 12E(iii) of the Order, the dust control plan, which is included in Paragraph II of the Health and Safety Plan, is hereby approved on the condition that all piled earth in Areas A and B also shall be wetted down on an as needed basis, commencing within 3 days from the effective date of the Order and continuing until the soil is covered over in the "old dike area." The term, "as needed basis," here shall mean a manner sufficient to prevent wind-blown dispersion of dust.

Pursuant to Paragraph 12E(ii) of the Order, the plan for containment of soil in the "old dike area" that is a part of the "Description of Remaining Construction Work in the Unit 268 Construction Site," dated May 21, 1984, is hereby approved subject to the following provisions:

- 1) any water pumped out of the "old dike area" shall be pumped to the 12,000-gallon storage tank provided for decontamination water described in the Health and Safety plan, paragraph VIII. As provided in the provision on decontamination water above, this water shall not be discharged from the tank without prior approval of EPA.
- 2) In response to Edwin Cooper's written and oral comments provided on May 22, 1984, I hereby modify paragraph 12B of the Order to delete the requirement that contaminated soil in area A be covered by a tarp or other material. Containment of this soil in the dike area under the tight schedule provided, using the dust control plan provided, should adequately satisfy the goals of the covering requirement.

I am deferring approval of the soil sampling plan provided under paragraph 12E(i) of the Order to allow time for further discussions on the details of this plan. Construction may commence prior to approval of this plan, however, so long as the asphalt or concrete covering not be installed until the plan is approved and samples are taken.

Sincerely yours,



Valdas V. Adamkus
Regional Administrator

cc: David Bach, Esquire
Ethyl Corporation